

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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BRIAN WATSON, DANIEL SAMARGHITAN,
ANNMARIE GREENE f/k/a ANNMARIE MOHAMMED,
JOSE ESPINAL, and LYMELL JACKSON, individually and
on behalf of all others similarly situated,

Civil Action Nos.
1:20-cv-04572
1:21-cv-01588

Plaintiffs

NOTICE OF MOTION

vs.

MANHATTAN LUXURY AUTOMOBILES, INC. d/b/a
LEXUS OF MANHATTAN,

Defendant.

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PLEASE TAKE NOTICE THAT, upon the annexed declaration of Jason M. Myers with supporting exhibits and accompanying memorandum of law, dated February 16, 2022, Defendant Manhattan Luxury Automobiles Inc. d/b/a Lexus of Manhattan will move this Court on a date to be set by the Court or as soon thereafter as counsel can be heard, before the Honorable Judge Lorna A. Schofield, United States District Court for the Southern District of New York, 40 Centre Street, Courtroom 1106, New York, New York, seeking an Order granting Defendant's Motion to Exclude the reports and testimony of Plaintiffs' expert witnesses Randall A. Snyder and Anya Verkhovskaya, on the grounds that it is inadmissible under Federal Rule of Evidence 702.

Dated: New York, New York
February 16, 2022

Respectfully submitted,
LONDON FISCHER LLP

By: Jason M. Myers
Jason M. Myers, Esq.

59 Maiden Lane
New York, New York 10038
(212) 972-1000
JMyers@ londonfischer.com

STEVENS & LEE, P.C.
Stephanie Lopez
669 River Drive, Suite 201
Elmwood Park, New Jersey 07407
(201) 857-6768
stephanie.lopez@stevenslee.com

*Counsel for Manhattan Luxury Automobiles Inc.
d/b/a Lexus of Manhattan*